

BEFORE THE FEDERAL ELECTION COMMISSION

FOUNDATION FOR ACCOUNTABILITY AND CIVIC TRUST,)

Complainant,

v.

CATALIST, LLC, et. al.,

Respondents.

2015 MAR 23 AM 11:13

OFFICE OF  
COUNSEL

MUR No. 6916

**RESPONSE TO COMPLAINT OF  
SCHNEIDER FOR CONGRESS AND ITS TREASURER**

Respondent SCHNEIDER FOR CONGRESS and its recently-deceased Treasurer HAROLD B. SCHNEIDER ("TREASURER"), through the undersigned counsel, respond to the Complaint by Complainant FOUNDATION FOR ACCOUNTABILITY AND CIVIC TRUST, MUR No. 6916, as follows:

Respondent SCHNEIDER FOR CONGRESS (C00374751) was a Primary Campaign Committee authorized by Candidate Jan Schneider (H2FL13139) for the 2001-2002 campaign cycle. While there was some relatively minor activity during the 2003-2004 cycle, this Committee was inactive during the period the subject of the Complaint through the present. Meanwhile, it should be noted in passing, there is *different* "Schneider for Congress" Democratic Campaign Committee (C00495952) for a *different* Candidate (H2IL10068) from a *different* state (Illinois, not Florida), which was active from April 1, 2011 through December 31, 2014 and had very significant receipts and disbursements.

Moreover, since Respondent SCHNEIDER FOR CONGRESS is not mentioned in the Complaint or Exhibits thereto it is difficult to surmise what it is supposed to have done, albeit apparently through clairvoyance. Should the Federal Election Commission or Complainant FOUNDATION FOR ACCOUNTABILITY AND CIVIC TRUST decide to pursue this further,

Respondent SCHNEIDER FOR CONGRESS and its TREASURER seek leave to supplement this Response in light of any clarifications.

1. **Allegations About Conduct Beginning in the 2005-2006.** The Complaint (p. 18) alleges that "beginning in the 2005-06 election cycle," numerous Respondents engaged in certain allegedly illegal activities with common vendors – in particular, Catalist LLC and NGP Van, LLC. The Complaint further alleges: "[t]he Democrats and their philosophical allies began this model of operation in the wake of the 2004 election " (p. 18); an improved data operation "was needed in the wake of the 2004 Presidential defeat of John Kerry" (p. 18); "Catalist was established in 2006" by two Democratic political operatives (p. 20); political insider Harold Ickes helped establish the soft money infrastructure "in the wake of passage of the Bipartisan Campaign Reform Act and the 2004 defeat of Democrat John Kerry" (p. 20); and so forth. Accordingly, the Complaint is not addressed to any campaign finance activity until *after* the 2003-04 election cycle.

2. **No Significant Financial Activity by Respondent After 2003-04.** As shown by FEC records, Respondent SCHNEIDER FOR CONGRESS had \$25 of receipts and only *de minimis* disbursements after the 2003-2004 campaign cycle. The following is the financial summary for SCHNEIDER FOR CONGRESS for the period January 1, 2005 through December 31, 2006:

**2006 COMMITTEE INFORMATION**

C00374751

**CANDIDATE INFORMATION**

Name: SCHNEIDER FOR CONGRESS

Schneider, Jan

ID:

Address: 487 Meadowlark Drive, SARASOTA, FL 34236

H2EL13139

Treasurer Name: Schneider, Harold Mr.

Office: H - House

Type: H - House

State: FL, District: 13

Designation: A - Authorized By A Candidate

Party: Democratic Party

**FINANCIAL SUMMARY - SCHNEIDER FOR CONGRESS**

From: 01/01/2005 To: 12/31/2006 ?

**I. RECEIPTS**

Itemized Individual Contributions \$0  
 Unitemized Individual Contributions \$0  
 Total Individual Contributions \$0  
 Party Committees Contributions \$0  
 Other Committees Contributions \$0  
 Candidate Contributions \$0

**TOTAL CONTRIBUTIONS \$0**

Transfers from Authorized Committees \$0  
 Candidate Loans \$0  
 Other Loans \$0  
**TOTAL LOANS \$0**  
 Offsets to Operating Expenditures \$0  
 Other Receipts \$0  
**TOTAL RECEIPTS \$0**

**Disbursements**

Operating Expenditures  
 Transfers To Authorized Committees

**II. DISBURSEMENTS**

Operating Expenditures \$39  
 Transfers To Authorized Committees \$106

Candidate Loan Repayments \$0  
 Other Loan Repayments \$0

**TOTAL LOAN REPAYMENTS \$0**

Individual Refunds \$0  
 Political Party Refunds \$0  
 Other Committee Refunds \$0

**TOTAL CONTRIBUTION REFUNDS \$0**

Other Disbursements \$0  
**TOTAL DISBURSEMENTS \$145**

The record is in all respects here pertinent the same for all election cycles covered by the Complaint. Except for one stray "Contribution" of \$25, left over "Operating Expenditures" of \$39 and "Transfers to Authorized Committees" of \$1,082, Respondent SCHNEIDER FOR CONGRESS had no financial activity. The following summarizes all activity after the 2003-2004 election cycle:

<u>Election Election Cycle</u>	<u>Receipts</u>	<u>Disbursements</u>
January 1, 2005 – December 31, 2006	\$0	\$145*
January 1, 2007 – December 31, 2008	\$0	\$976**
January 1, 2009 – December 31, 2010	\$0	\$0
January 1, 2011 – December 31, 2012	\$25	\$0
January 1, 2013 – December 31, 2014	\$0	\$0

\* Includes \$106 under "Transfers to Authorized Committees" and \$39 of "Operating Expenditures" (see p. 3 *supra*).

\*\* Represents \$976 under "Transfers to Authorized Committees."

In sum, SCHNEIDER FOR CONGRESS is honored to be among the distinguished list of Democratic Campaign Committees named as Respondents in the Complaint – but the mystified as to the basis for its inclusion. Respondent SCHNEIDER FOR CONGRESS and its TREASURER respectfully request that they be dropped from MUR No. 6916 – or that, at the very least, Complainant FOUNDATION FOR ACCOUNTABILITY AND CIVIC TRUST be required to provide some clue as to why they were included.

Dated: March 16, 2015

Respectfully submitted,

  
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